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14  
15 **UNITED STATES DISTRICT COURT**  
16  
17 **DISTRICT OF NEVADA**

18 VANGUARD DEALER SERVICES, LLC and  
19 MOTOR DEALER SERVICES GROUP, LLC,

20 Case No. 2:21-cv-01121-JAD-EJY

21 Plaintiff,

22 **STIPULATION AND ORDER FOR  
23 EXTENSION OF TIME TO FILE REPLY  
24 IN SUPPORT OF MOTION TO DISMISS  
COUNTERCLAIM AND MOTION TO  
STRIKE AFFIRMATIVE DEFENSES**

25 v.

26 **(FIRST REQUEST)**

27 JORGE CERVANTES and CEC INDUSTRIES  
28 INC. d/b/a DEALERS DIRECT SYSTEMS  
and/or DEALERS DIRECT CONSULTANTS,

29 Defendants.

30 ECF No. 71

31 JORGE CERVANTES, CEC INDUSTRIES  
32 INC. d/b/a DEALERS DIRECT SYSTEMS  
33 and/or DEALERS DIRECT CONSULTANTS,

34 Counterclaimants,

35 v.  
36 VANGUARD DEALER SERVICES, LLC and  
37 MOTOR DEALER SERVICES GROUP, LLC,

38 Counterdefendants.

39 Plaintiffs/counterdefendants Vanguard Dealer Services, LLC and Motor Dealer Services  
40 Group, LLC, and defendants/counterclaimants Jorge Cervantes and CEC Industries, Inc., hereby  
41 stipulate and agree to the following:

42 . . .

1       1. On August, 29, 2022, defendants filed an answer to plaintiffs' second amended  
 2 complaint and counterclaim. ECF No. 59. On October 6, 2022, plaintiffs filed a motion to dismiss  
 3 the counterclaim and a motion to strike affirmative defenses (the **motion**). ECF Nos. 62 & 63. On  
 4 November 3, 2022, defendants filed their opposition to plaintiffs' motion. ECF Nos. 69 & 70.

5       2. The current deadline for plaintiffs to file their reply is November 10, 2022.

6       3. Counsel for plaintiffs are in the process of conferring with their clients regarding their  
 7 reply in support of the motion. As such, the parties hereby stipulate and agree that the deadline for  
 8 plaintiffs' reply shall be extended by thirteen (13) days, up to and including November 23, 2022.

9       4. The parties agree this stipulation is not meant for delay and will not prejudice any  
 10 party.

11       DATED this 9th day of November, 2022.

12 **AKERMAN LLP**

13       \_\_\_\_\_  
 14       /s/ *Scott R. Lachman*  
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23 **SEMENZA KIRCHER RICKARD**

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 25       /s/ *Katie L. Cannata*  
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 36       *Attorneys for Jorge Cervantes and  
 37 CEC Industries, Inc.*

38       **IT IS SO ORDERED.**

39         
 40       \_\_\_\_\_  
 41       **UNITED STATES DISTRICT JUDGE**

42       **DATED: 11/14/2022, nunc pro tunc to  
 43 11/10/22**